

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JENNIFER RADER, GREGORY
SEPELLA, MARIA GALARZA, AND
ANGELA BUCKALOO

Plaintiffs,

v.

COLLECTION MANAGEMENT
COMPANY d/b/a CREDIT MANAGEMENT
COMPANY

Defendant.

CASE NO. 3:17-cv-01005-K

HONORABLE ED KINKEADE

**DEFENDANT’S MOTION TO DISMISS,
OR IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendant Collection Management Company d/b/a Credit Management Company (“CMC”), by the undersigned counsel, respectfully submits this Motion to Dismiss, or in the alternative, to Transfer Venue, seeking to dismiss Plaintiff Gregory Sepella’s claims under the Telephone Consumer Protection Act, or alternatively, to transfer this case to the Western District of Pennsylvania.¹ In support thereof, CMC relies upon the accompanying Brief, which is incorporated by reference as if fully set forth herein.

Date: June 6, 2017

Respectfully Submitted,

MALONE AKERLY MARTIN PLLC

By: /s/ Xerxes Martin

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¹ On June 5, 2017, the claims of all Plaintiffs except Gregory Sepella were dismissed.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion to Dismiss, or in the alternative, to Transfer Venue was served upon all counsel of record this 6th day of June, 2017, via the Court's Electronic Filing System:

MALONE AKERLY MARTIN PLLC

By: /s/ Xerxes Martin
Eugene Xerxes Martin, IV, Esq.